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IN THE UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,
Plaintiff,
v.
DALLAS ERIN HUMBER,
Defendant.

CASE NO. 2:24-CR-00257-DC

STIPULATION REGARDING EXCLUDABLE
TIME PERIODS UNDER SPEEDY TRIAL ACT
AND ORDER

STIPULATION

1. By previous order, this matter was set for status on March 21, 2025.

2. By this stipulation, the parties now move to continue the status conference until June 6, 2025, and to exclude time between March 21, 2025, and June 6, 2025, under Local Codes T2 and T4.

3. The parties agree and stipulate, and request that the Court find the following:

a) At the previous status conference, on February 14, 2025, the Court granted the government's request to designate a Classified Information Security Officer pursuant to the Classified Information Procedures Act ("CIPA"), and the Court deferred setting a discovery and motion schedule in relation to the classified information. The parties anticipate they will confer and propose a discovery and motions schedule through a stipulation.

b) In mid-March, the government will provide defense counsel with unclassified discovery consisting of more than 3,500 files, including thousands of pages of documents, hundreds of hours of audio and video recordings, and the complete digital images of two devices seized from the defendants, which together comprise approximately 25 terabytes of data. These materials will be produced pursuant to a Protective Order. Moreover, the nature of the charges contained within the indictment, volume of discovery, and the issues presented concerning the CIPA make the case unusual and complex that it is unreasonable to expect adequate preparation for pretrial proceedings or for the trial itself within the time limits established by the Speedy Trial Act.

c) Counsel for the defendant will require additional time to review the discovery materials and charges, conduct investigation, conduct research related to the charges, to assess the viability of any pretrial motions, and arrange for in-person visits to discuss potential resolutions with their clients.

d) Counsel for the defendant believes that failure to grant the above-requested continuance would deny them the reasonable time necessary for effective preparation, taking into account the exercise of due diligence.

e) Based on the above-stated findings, the ends of justice served by continuing the case as requested outweigh the interest of the public and the defendants in a trial within the

1 original date prescribed by the Speedy Trial Act.

2 f) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161,
3 *et seq.*, within which trial must commence, the time period of March 21, 2025 to June 6, 2025,
4 inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), (B)(ii) and (iv) [Local
5 Codes T2 and T4] because it results from a continuance granted by the Court at the parties'
6 request on the basis of the Court's finding that the ends of justice served by taking such action
7 outweigh the best interest of the public and the defendant in a speedy trial.

8 4. Nothing in this stipulation and order shall preclude a finding that other provisions of the
9 Speedy Trial Act warrant time periods excludable from the period within which a trial must commence.

10 IT IS SO STIPULATED.

11 Dated: March 13, 2025

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13 Acting United States Attorney
14 Eastern District of California

15 /s/ Robert Abendroth
16 ROBERT ABENDROTH
17 Assistant U.S. Attorney

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/s/ Samuel Kuhn
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SUE BAI
Supervisory Official
National Security Division

/s/ Partick Cashman
PATRICK CASHMAN
Trial Attorney

18 Dated: March 13, 2025

19 By: /s/ Noa Oren
20 NOA OREN
21 Counsel for Dallas Erin Humber

22
23 ORDER

24 IT IS SO ORDERED.
25

Dated: March 13, 2025


26 Dena Coggins
27 United States District Judge
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